From: [redacted]

To: RMPRC@epacdx.net
Cc: Daniel.Kevin@epa.gov, [redacted]
Baginski.Alfred@epa.gov,
Date: Tuesday, November 25, 2

Attz [redacted] EPA - RMP Info.pdf (1MB)

To Whom It May Concern:

After meeting with Mary Hunt, Kevin Daniel and Alfred Baginski and discussing our business, I feel the need to better explain why [redacted] does not qualify for the RMP program.

We do not meet the threshold requirements of the chemicals listed for your program.

Our Nitric Acid is 67% concentration, the threshold is 80% concentration, (Certificate of Analysis attached).

Our HCL is 33%, the threshold is 37% concentration, (Certificate of Analysis attached).

The threshold for Ammonia with a concentration greater than 20% is 20,000 pounds. We consulted the manufacturer, Tanner Industries, who stated there is 2.20 pounds of anhydrous ammonia in every gallon of 29.73% ammonia solution. Our portable tanks
are filled to weight at 2,200 pounds, which converts to 294.2 gallons of 29.73% ammonia solution. This extends to 647.2 pounds of anhydrous ammonia per portable tank. This converts to over thirty portable tanks in stock to exceed the 20,000 pound threshold. We do
not have the space or business to support such a high level and therefore, do not meet the 20,000 pound threshold. I have attached the calculation which was also discussed with the EPA team.

While in practice we currently maintain levels below the 20,000 pound threshold, we will be posting a documented procedure to our inventory management system identifying our reorder point at less than ten portable tanks and replenishment of not more than twenty portable
tanks as recommended by your EPA team.

I apologize for any confusion and hope this clarifies our position.

Best regards,

Notification
Code
3043

[redacted]

Certificate of Analysis

Customer:
Address:
Customer PO#
Bill of Lading #:

Product: HYDROCHLORIC ACID 20 DEGREES
Lot #: [redacted]
Ship Date: [redacted]
Trailer #:

Analysis	Specification	Result
HCL %	31.45% Min - 33.5% Max	33.06
Baume	20.00 Bé Min - 21.00 Bé Max	20.00
Iron	1.5 ppm maximum	PASS < 1.5 ppm
Specific Gravity @ 60 degree F	1.160 Min - 1.170 Max	1.160
Color	10 APHA Maximum	5
Oxidizing Substances as CL2	10 ppm Maximum	PASS < 10 ppm
Total Organic Carbon	5 ppm maximum	PASS < 5 ppm

Net Weight: 421727.2813 lbs

Signature

*Product listed meets MSF standards.
*Product is Kosher Certified.
*Conforms to or exceeds the requirements set forth by the Food Chemical Codex, Fifth Edition.
*Product listed manufactured at BeechTech, LLC. Petersburg, VA.

Attention:
FAX #:

Nitric Acid - 67%

Date: 8/19/2014

Bill of Lading No.:

Release#

Customer PO#:

Batch#
Ship to PO#

Tractor#
Trailer#
BK#

CERTIFIED ANALYSIS

		Specification
Strength, Wt. % HNO_3	67.3	66.9 - 67.9
Oxides, Wt. % HNO_2	0.003 Max	
Residue after ignition, ppm	30 Max.	
Chloride, ppm Cl	4 Max.	
Sulfate, ppm SO_4	4 Max.	
Iron, ppm Fe	15 Max.	

Ammonia 29.73%

2.20#	ammonia per gallon solution
0.8963	specific gravity of ammonia
8.343#/gal	Water
7.478#/gal	Ammonia 29.73%
2,200#	Ammonia 29.73% tote filled to weight
294.20 gals	Ammonia 29.73% tote filled to gallons
647.25 #	Ammonia per tote of solution
30.9	Number of full totes to meet 20,000# threshold